Claim 1 claims:

"(b) a second transport packet containing

a second data identifier (PID) for identifying said Internet information, said information being contained in a payload of said second transport packet; and

ancillary data containing said second data identifier and supporting identification and decoding of said Internet information."

Goodman does not suggest or disclose this claimed feature. Specifically, in the Office Action, the Examiner states that Goodman discloses a network, "in which Internet data and MPEG data are transmitted via ATM, each packet had a PID which identifies the packet is a MPEG video data or a data packet," (Office Action, page 2, lines 15-18). Applicants disagree with the Examiner's assertion.

Goodman, when making reference to PIDs, only refers to PID values for a particular television type of program, "encoded in MPEG II form, a first PID value for packets containing video, a second PID value for packets containing audio and another PID value for a packet containing a program map," (Goodman, column 14, lines 30-34). These types of data are MPEG II television program data, not "Internet image information" as claimed in Claim 1.

Also, the mapping operation performed by Goodman relies upon VPI/VCI values to determine the sources of data because, "different connections have different VPI/VCI values," (Goodman, column 13, lines 59-60). This means that the mapping operation disclosed in Goodman considers the source of data (depending on VPI/VCI values) instead of the type of data (video program data versus Internet image information as in Claim 1); see Goodman, column 14, lines 48-62. These VPI/VCI values, along with the PID values relevant to the MPEG program data are used to route data associated to a respective DET, not to identify Internet image information, as in Claim 1.

Claim 1 additionally claims ancillary data for, "supporting the identification and decoding of said Internet information." None of the PID, VPI/VCI values, possible IP based information, or other values disclosed in Goodman are ancillary data used to decode the claimed Internet image information of Claim 1. Furthermore, in the Office Action, the Examiner does not show where such a decoding of Internet image information takes place, in view of the claimed ancillary information. The Examiner instead recites that Goodman "re-encapsulates the IP packets and forwards them to the proper device," (Office Action, page 2, lines 21-22); this is not however "decoding of said Internet information" as in Claim 1. Applicants note that Claim 2 further

clarifies the scope of ancillary data for purposes of the invention; as such types of information are not in Goodman, although Claim 2 was not rejected in this section.

For the reasons given above, Claim 1 is believed to overcome the rejection under 35 U.S.C. § 102(e), and Applicants request that the rejection of Claim 1 be withdrawn. For the same reasons listed above for Claim 1, Applicants believe that Claims 4-10 and 12-15 overcome the rejection under 35 U.S.C. § 102(e). Applicants request that the rejection to Claims 4-10 and 12-15 be withdrawn.

II. Rejection under 35 U.S.C. § 103(a)

A. Claims 2, 3, 11, and 16-18

Claims 2, 3, 11, and 16-18 are rejected under 35 U.S.C. § 103(a) as being as being unpatentable over Goodman (US Pat No. 5,666,487), in view Chaddha et al. (US Pat No. 6,173,317, hereafter Chaddha). The Applicants disagree with this ground of rejection.

One skilled in the art would not combine Chaddha with Goodman to arrive at the features in Claim 2, 3, 11, and 16-18 because Goodman teaches away the combination of both references. Specifically, Goodman references data being in the format of AAL5 to operate correctly (Goodman, column 12, lines 3-4). However, Goodman also restricts the type of data used as any "non-real time service" (Goodman, column 11, lines 63-67). Chaddha is concerned with the synchronization of "video/audio and annotation streams" (Chaddha, Abstract), which streams may need to be synchronized in closed to real time by a stream server (streaming media). In contrast, Goodman specifically accounts that it has problems with synchronization or timing information (an operation critical for Chaddha) because of its asynchronous nature (see Goodman in regards to voice communications, column 12, lines 4-7), resulting in that one skilled in the art would not combine Goodman with Chaddha to arrive at the features in Claims 2, 3, 11, and 16-18, because of the references teach away from their combination.

For the reasons given above, Claims 2, 3, 11, and 16-18 are believed to overcome the rejection under 35 U.S.C. § 103(a), and Applicants request that the rejection of Claims 2, 3, 11, and 16-18 be withdrawn.

B. Claims 19-22

Claims 19-22 are rejected under 35 U.S.C. § 103(a) as being as being unpatentable over Goodman (US Pat No. 5,666,487), in view Chaddha et al. (US Pat